

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CARNELL GARVIN,
Plaintiff,

v.

C.A. No. 05-30052

D.A. SULLIVAN & SONS, INC. and
CONSTRUCTION SAFETY SERVICES, INC.,
Defendants.

D. A. SULLIVAN & SONS, INC.'S AUTOMATIC DISCLOSURE

Now comes the Defendant, D. A. Sullivan & Sons, Inc., (hereinafter "Sullivan") and submits its Automatic Disclosure pursuant to Fed. R. Civ. P. 26 (a) (1) and Local Rules for the District of Massachusetts Rule 26.2.

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION:

In addition to those persons identified in the Plaintiff Automatic Disclosure:

1. Mark Sullivan
D. A. Sullivan & Sons, Inc.
Northampton, MA
2. Tom Ryan
D. A. Sullivan & Sons, Inc.
Northampton, MA
3. Roger Mee
CSSI
425 Union Street
West Springfield, MA 01089
4. Carmen Garvin
5. Wayne A. McClintock
Former employee of D. A. Sullivan
58 Curtis Ave.
Dalton, MA 01226

6. Michael Shea
Electrician subcontractor's foreman
Address unknown .
7. Bernard J. Joly, Jr.
A-Deck, Inc. - foreman
Address unknown
8. Steve John Smith
A-Deck, Inc. - employee
Address unknown

B. DOCUMENTS:

1. Project Manual
2. D. A. Sullivan & Sons, Inc. - Safety and Health Handbook
3. D. A. Sullivan & Sons, Inc. - A-Deck, Inc. - Subcontract -
September 12, 2003 .
4. Construction Safety Services, Inc. - D. A. Sullivan - Safety and Health
Consulting Agreement - September 1, 2000.
5. D. A. Sullivan & Sons, Inc. - Daily Report No. 00138 - July 23, 2004
6. D. A. Sullivan & Sons, Inc. - Accident Report - July 23, 2004
7. Statement - Steven John Smith
8. Fall Protection Plan - Bernard J. Joly, Jr. / A-Deck, Inc. - July 26, 2004
9. Construction Safety Services, Inc. - Site Safety Reviews - November 4,
2003 to November 18, 2004.

C. DAMAGES:

Not Applicable. .

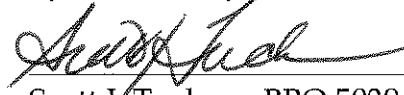
D. INSURANCE POLICY:

Acadia Insurance - Primary coverage - \$1M

Acadia Insurance - Excess coverage - \$10M

Fireman's Fund Insurance - Second layer of excess coverage - \$15M

The Defendant,
D. A. Sullivan & Sons, Inc.,
By its Attorneys



Scott I. Tucker - BBO 503940
Scott H. Kremer - BBO 559316
Tucker, Heifetz & Saltzman, LLP
Three School Street
Boston, MA 02108
(617) 557-9696

CERTIFICATE OF SERVICE
I hereby certify that I made service
of the foregoing document in accordance
with the provisions of Fed. R. Civ. P. 5.
6-28-05 Scott I. Tucker